

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

HENNA CARDENAS, individually and : Case No.: **9:20-cv-376-RMG**
on behalf of all other similarly situated, :
: Plaintiff, :
: :
v. :
: :
RESORT SALES BY SPINNAKER, :
INC., a South Carolina corporation, and :
RESORT SALES MISSOURI, INC., a :
Missouri Corporation :
Defendants.

PLAINTIFF'S ANSWER TO RULE 26.01 INTERROGATORIES

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: Plaintiff is unaware of any entity that may have a subrogation interest in this matter.

B. As to each claim, state whether it should be tried by jury or non-jury and why.

RESPONSE: A jury trial is demanded for each claim presented because all the claims involve an underlying theme of violation of public interest, therefore it should be a jury of peers from the public to make the ultimate decision on the issues in this case.

C. State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: The Plaintiff is an individual, not a publicly owned company.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: Defendants are headquartered in Hilton Head, SC, which is in this division. Moreover, a substantial part of the events giving rise to Plaintiff's claims occurred in this division.

E. Is this action related in whole or in part to any matter filed in this District, whether civil or criminal? If so, provide:

1. A short caption and the full case number of the related action;
2. An explanation of how the matters are related; and
3. A statement of the status of the related action.

RESPONSE: This action is not related to any other matter, civil or criminal in the District of South Carolina.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully Submitted,

HENNA CARDENAS, individually and on behalf of class
of similarly situated individuals

Dated: January 30, 2020

By: /s/ Margaret A. Collins
One of Plaintiff's Attorneys

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*Motions for admission *pro hac vice* to be filed